

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	)	
	)	1:13-mj-00145-LM
	)	
v.	)	
	)	
LEONARDO ALMONTE-RAMIREZ	)	

ASSENTED-TO MOTION OF THE UNITED STATES TO EXTEND THE DATE FOR  
INDICTMENT PURSUANT TO 18 U.S.C. § 3161(h)(7)(A), AND TO CONTINUE THE  
SHOW CAUSE HEARING

The United States of America through John P. Kacavas, the United States Attorney for the District of New Hampshire, with assent from Leonardo Almonte-Ramirez, by and through his attorney, Charles Bookman, respectfully requests that the Court (1) continue and extend the deadline for the government to obtain an indictment in this matter for approximately 30 days, to **February 19, 2014**, pursuant to 18 U.S.C. § 3161(h)(7)(A); and (2) continue the Show Cause Hearing – currently scheduled for January 16, 2014 – to **February 20, 2014**.

1. On December 13, 2013, a criminal complaint was filed, charging the defendant with a violation of 21 U.S.C. § 841(a)(1) (possession with intent to distribute controlled substances, including cocaine base, cocaine, and heroin). The defendant's initial appearance was scheduled for Thursday, December 19, 2013. At the request of the defendant's counsel, and with the assent of the United States, the defendant's initial appearance was continued to January 14, 2014. A Show Cause Hearing regarding indictment and compliance with 18 U.S.C. § 3161(b) was set in this Court for January 16, 2014.

2. The United States and the defendant's counsel agree that it is in their mutual interest to engage in discussion in order to determine if a pre-indictment resolution is feasible.

Under the terms of the Speedy Trial Act, this case must be indicted within 30 days from the date of the defendant's initial appearance, plus any excludable time. See 18 U.S.C. § 3161(b). The government and counsel for the defendant believe that the ends of justice will be best served by extending the date by which indictment is required, and continuing the date of the Show Cause Hearing, in order to facilitate those discussions and potentially conserve grand jury resources.

3. The defendant and the government also request that the Court enter an order excluding the period of the continuance from the Speedy Trial Act calculations for this case.

For the foregoing reasons, the United States of America, with assent from Leonardo Almonte-Ramirez, by and through his attorney, Charles Bookman, respectfully requests that the Court extend the period for an indictment to be returned to **February 19, 2014**, pursuant to 18 U.S.C. § 3161(h)(7)(A); re-schedule the pending Show Cause Hearing to **February 20, 2014**; and exclude the period of continuance from Speedy Trial Act calculations for this case.

Respectfully submitted,

JOHN P. KACAVAS  
United States Attorney

By: /s/ Nick Abramson  
Nick Abramson  
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Dated: December 20, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of December, 2013, a copy of the Assented-To Motion to Extend the Date for Indictment and Continue the Preliminary Hearing was electronically served upon Charles Bookman, Esq., counsel for the defendant.

/s/ Nick Abramson  
Nick Abramson  
Assistant U.S. Attorney